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March 8, 2021

**VIA ECF**

Honorable James L. Cott  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

RE: Kaye v. NYC Health & Hospitals Corp. et. al.  
Index No.: 18-cv-12137(JPC)(JLC)

Dear Honorable Judge Cott:

The parties jointly and respectfully submit this letter pursuant to Your Honor's Order. (ECF. Dkt. 138 ) On January 5, 2021, I notified the Court that I had tested positive for Covid-19, and requested a stay of 60 days. Your Honor graciously granted my request, and stated that the parties would convene on March 8, 2021. In compliance with Your Honor's Order, both parties have called the Court this morning, however we have not received a response from Chambers or from any other Court personnel.

When I originally requested the stay, I did not believe that I would need the entire 60 days to recover. However, the impact of the virus on my respiratory, cardiovascular and nervous systems was far worse than I originally thought. In the upcoming weeks, I will continue to meet and test with specialists to fully assess my status, and to further my treatment.

Since I have requested the same stay in my other the cases where there were pending issues, I am currently in the process of contacting my clients and opposing counsel in those matters as well. Additionally, since the stays in those cases also ends today, I will also be updating the Court in those matters. In the matter herein, since the parties have not had the opportunity to address any of the outstanding discovery disputes before today's call, the parties have agreed to meet and confer on March 18, 2021 at 11AM.

In closing, I would like to thank Your Honor again for granting me the stay. Although I have not fully recovered, the time granted was tremendously helpful and has ensured that I will be able to move forward.

Thank you,

/s/

Special Hagan, Esq.  
Attorney for Plaintiff



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